

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as
Governor of Texas, *et al.*,

Defendants.

No. 3:21-cv-259-DCG-JES-JVB

RESPONSE OF *BROOKS* PLAINTIFFS TO MOTION TO CONSOLIDATE

The *Brooks* Plaintiffs' original complaint challenges SB4's configuration of Senate District 10. *See Brooks, et al. v. Abbott, et al.*, No. 1:21-cv-00991-LY-JES-JVB (W.D. Tex.). The *Brooks* case is pending in the Austin Division and was filed shortly after several of the other cases noted in Defendants' motion. As the *Brooks* Plaintiffs informed Defendants with regard to both consolidation motions that have been filed to date, the *Brooks* Plaintiffs believe their case should be consolidated with whichever case is determined to be the Lead Case, but take no position as to which earlier filed case is the appropriate Lead Case.

The *Brooks* Plaintiffs file this response, however, to urge expeditious resolution of the issue of consolidation. The *Brooks* Plaintiffs intend to move quickly to seek preliminary injunctive relief, including with respect to the configuration of SD10 for the 2022 election and with respect to the candidate filing deadlines for SD10, and believe it would preserve judicial economy for their motion to be processed in the consolidated forum in which it will be adjudicated.

November 15, 2021

Respectfully submitted,

/s/ Chad W. Dunn

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